UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF MASSACHUSETTS

SONYA LARSON

Plaintiff,

v.

Civil Action No.

1;19-cv-10203-IT

DAWN DORLAND PERRY et al.,

Defendants.

PROPOSED JOINT SCHEDULING ORDER FOR FURTHER PROCEEDINGS IN THIS CASE

The parties jointly submit the following proposed scheduling order for further proceedings in this action.

- A. <u>Discovery Deadline</u>. **December 31, 2020**. In light of the Covid-19 pandemic, depositions will take place as necessary, via video or Internet conference.
- B. <u>Motions to Amend</u>. The Parties request until **August 31, 2020**, to file Motions to Amend the pleadings.
- C. <u>Alternative Dispute Resolution</u>. The Parties remain open to opportunities to resolve this matter and will inform the Court when a referral to a Magistrate Judge will be most fruitful.
- D. Expert Discovery.

Plaintiff: February 15, 2021.

Rebuttal/Defendants/Counterclaim: March 30, 2021.

- E. <u>Dispositive Motions and Further Requests for Admission</u>. The Parties can file dispositive motions and further requests for admission up to **May 1, 2021**.
- F. <u>Trial</u>. If necessary, trial can commence in **August 2021**.

SONYA LARSON, By her attorney,

April 24, 2020

/s Andrew D. Epstein

Andrew D. Epstein, Esq. (BBO #155140) Barker, Epstein & Loscocco

176 Federal Street Boston, MA 02110

Tel: (617) 482-4900 Fax: (617) 426-5251 Photolaw@aol.com

DAWN DORLAND PERRY

By her Attorneys,

/s Suzanne M. Elovecky
Suzanne M. Elovecky, Esq. (BBO # 670047)
Partridge Snow & Hahn LLP
30 Federal Street
Boston, MA 02110
t: (857) 214-3097
f: (617) 292-7910
selovecky@psh.com

COHEN BUSINESS LAW GROUP, PC AND JEFFREY A. COHEN, ESQ.

By their attorneys,

/s Matthew H. Greene
Matthew H. Greene, Esq. (BBO # 673947)
Boyle Shaughnessy Law, PC
695 Atlantic Avenue
Boston, MA 02111
T 617.451.2000
F 617.451.5775
MGreene@boyleshaughnessy.com

Certificate of Service

I certify that the Proposed Joint Scheduling Order was filed through the Court's ECF system and was served on all parties in this action.

April 24, 2020 /s Andrew D. Epstein

Andrew D. Epstein, Esq.